

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

RICHARD WAYNE WRIGHT, SR.,	)	
AIS # 187140,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 2:05-CV-439-A
	)	
SYLVESTER NETTLES, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT’S MOTION FOR EXTENSION OF TIME FOR  
SUBMISSION OF HIS SPECIAL REPORT AND ANSWER**

COMES NOW Dr. William Sanders (“Sanders”), and files this Motion for an Extension of Time for Submission of his Special Report and Answer. Defendant respectfully requests an additional thirty (30) days to submit his Special Report, required evidentiary materials (including the affidavits of all pertinent individuals) and Answer. If this motion is granted, the new deadline would be February 9, 2006. As grounds for this motion, Defendant states as follows:

1. On July 27, 2005, Plaintiff filed an Amended Complaint naming fifty-two total defendants, including Dr. William Sanders. Plaintiff alleged that he was denied proper medical treatment, that he was treated improperly and was forced to take medication.

2. Dr. William Sanders was not served until December 21, 2005. Dr. Sanders has been ordered to obtain sworn statements of all persons having knowledge of the subject matter. While several affidavits have been attached to the special reports and answers filed

by co-defendants, the undersigned counsel may have to contact additional people. Further, Sanders and the undersigned counsel will have to review Plaintiff's medical records.

3. Undersigned counsel is working diligently to comply with the Court's Order requiring Defendant to submit his Special Report and Answer. To properly do so, undersigned counsel hereby requests a thirty day extension to ensure all of the accurate information is gathered.

WHEREFORE, PREMISES CONSIDERED, Defendant Dr. William Sanders respectfully requests that this Honorable Court grant an extension of time allowing Defendant time to file his Special Report, required evidentiary materials and Answer on or before February 9, 2006.

Respectfully submitted this 27<sup>th</sup> day of December, 2005.

Respectfully Submitted,

/s/Gregory F. Yaghmai

ASB-2411-H67G

Attorney for Dr. William Sanders

Scott, Sullivan, Streetman & Fox, P.C.

2450 Valleydale Road

Birmingham, Alabama 35244

Phone: 205-967-9675

Facsimile: 205-967-7563

E-mail: [gyaghmai@sssandf.com](mailto:gyaghmai@sssandf.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of December, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and this is to certify that a copy of the foregoing was served upon the following by placing a copy of same in the United States Mail, first class postage prepaid and properly addressed this 27<sup>th</sup> day of December, 2005:

Inmate Richard Wayne Wright, Sr.  
AIS # 187140  
Ventress Correctional Facility  
P. O. Box 767  
Clayton, AL 36016

/s/Gregory F. Yaghmai

ASB-2411-H67G

Attorney for Dr. William Sanders

Scott, Sullivan, Streetman & Fox, P.C.

2450 Valleydale Road

Birmingham, Alabama 35244

Phone: 205-967-9675

Facsimile: 205-967-7563

E-mail: [gyaghmai@sssandf.com](mailto:gyaghmai@sssandf.com)